

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH LLC,
Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,
Defendants.

Civil Action No. 2:23-cv-00352-JRG-RSP

HEADWATER RESEARCH LLC,
Plaintiff,

v.

T-MOBILE USA, INC., and SPRINT CORP.,
Defendants.

Civil Action No. 2:23-cv-00377-JRG-RSP

HEADWATER RESEARCH LLC,
Plaintiff,

v.

AT&T INC. AT&T SERVICES, INC., AT&T
MOBILITY, LLC, and AT&T CORP.,
Defendants.

Civil Action No. 2:23-cv-00397-JRG-RSP

**JOINT MOTION TO ADJUST RESPONSE AND REPLY DEADLINES FOR PENDING
AND FORTHCOMING MOTIONS**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Corporate Services Group, Inc. (collectively, “Verizon”), Defendants

T-Mobile USA, Inc. and Sprint Corp. (collectively, “T-Mobile”), and Defendants AT&T Inc., AT&T Services, Inc., AT&T Mobility, LLC, and AT&T Corp. (collectively, “AT&T”) (collectively, the “Parties”) respectfully file this Joint Motion to Adjust the Response and Reply Deadlines for Pending and Forthcoming Motions and would show the Court as follows:

The current deadlines for Headwater to respond to Verizon’s, T-Mobile’s, and AT&T’s Motions for Sanctions Under FRCP 37(e)(1) (Verizon Dkt. 164, T-Mobile Dkt. 163, AT&T Dkt. 118) are April 2, 2025, April 3, 2025, and April 8, 2025, respectively. At this time, the Parties request a brief adjustment of the briefing schedule and request an extension of Headwater’s response deadline to April 8, 2025 in the Verizon and T-Mobile cases and to extend Verizon, T-Mobile, and AT&T’s reply deadline to April 21, 2025.

Additionally, the current deadline for Verizon, T-Mobile, and AT&T to reply to any of their forthcoming motions for summary judgment and motions to strike expert testimony, including *Daubert* motions, is April 23, 2025. At this time, the Parties request a brief extension of the due date of Verizon’s, T-Mobile’s, and AT&T’s replies to April 30, 2025.

The Parties request a brief extension of the above deadlines to align the briefing schedules of the Motions for Sanctions and to avoid unnecessary conflicts between the briefing schedules for the Motions for Sanctions and the forthcoming dispositive motions and motions to strike expert testimony.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The Parties have corresponded and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion.

Dated: March 28, 2025

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CERTIFICATE OF CONFERENCE

I hereby certify that, on March 28, 2025, counsel for Verizon, T-Mobile, and AT&T conferred with counsel for Plaintiff and that this Joint Motion is unopposed.

/s/ Josh A. Krevitt
Josh A. Krevitt

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Josh A. Krevitt
Josh A. Krevitt